

Snake River Alliance  
Pocatello, ID  
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## Snake River Alliance

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February 23, 2001



Gary Hartman  
US Department of Energy  
Oak Ridge Operations, DP-80  
Box 2001  
Oak Ridge, TN 37831  
By FAX: 865/576-1237

Dear Mr. Hartman:

The Snake River Alliance is an Idaho-based grassroots group working for peace and justice, the end to nuclear weapons production activities, and responsible solutions to nuclear waste and contamination. The Alliance has 1,300 dues-paying members in Idaho and 39 other states. I submit these comments on the draft Y-12 site-wide environmental impact statement on behalf of our members.

I confine our comments—and our opposition to the preferred alternative—to two broad areas: 1) the lack of need for a new bomb plant; 2) the crying need for responsible cleanup and management of the Cold War legacy at Oak Ridge and the rest of the Department of Energy's weapons complex.

The preferred alternative of the Y-12 draft EIS lays the groundwork for a complete new bomb manufacturing complex at Oak Ridge. The DOE would continue "life extension upgrades" so current US nuclear weapons could be certified "reliable" for one hundred years. And the plan goes further. The DOE would manufacture at Oak Ridge parts for new bombs as part of the effort to develop a new generation of "mini-nukes," which would in turn lead to a new arms race. No country on earth can afford to waste its economic, environmental, and moral resources on new nuclear weapons and a new arms race.

The "need" for this new plant is based on a stockpile of 6,000 nuclear weapons. But treaty commitments have already been made that shrink the arsenal below 6,000. Further, the US has already agreed in principle to much deeper cuts in START 3 negotiations. Both Russian President Vladimir Putin and US President George W. Bush have indicated support for even deeper

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### Comment No. 1

### Issue Code: 16

Since the end of the Cold War, the United States has significantly reduced the size of its nuclear weapons stockpile, and DOE has dismantled more than 15,000 nuclear weapons. At the present time, the United States is further downsizing its deployed nuclear weapons stockpile consistent with the terms of START I and START II. Although Russia suspended its nuclear weapons dismantlement actions on January 20, 2001, DOE has continued weapons dismantlement activities. While future arms control reductions may change requirements for maintaining the weapons stockpile, DOE is responsible for meeting the current requirements set forth by the President and Congress. The need for nuclear weapons and the issue of how many nuclear weapons the United States maintains as a nuclear deterrent are beyond the scope of the Y-12 SWEIS. However, whether the U.S. arsenal stays at 6,000 or goes below 6,000, the nuclear weapons would still require maintenance and monitoring and the facilities to do that would need to be modernized.

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cuts. The US does not "need" nuclear weapons—let alone 6,000 of them—and therefore does not need the New Special Materials Facility.

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cont.

What the US does need is the resources to deal responsibly with the legacy of the Cold War. The \$4 billion that would go to the DOE's preferred alternative in the draft Y-12 EIS can be better spent. Y-12 itself needs new facilities for dismantling nuclear weapons and safe, secure, and transparent facilities for processing and storing highly enriched uranium in non-weapons usable forms. Cleanup at Oak Ridge will take billions of dollars, and it is folly to divert resources to the production of more nuclear pollution than is already present at Oak Ridge. Oak Ridge is, of course, only one of the many facilities throughout the country that have been seriously damaged by past nuclear weapons production. At the Idaho National Engineering and Environmental Laboratory the most difficult and expensive cleanup tasks—high-level waste and buried TRU waste—lie before us.

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The DOE contemplates building a \$4 billion new bomb plant. At the same time, rumors circulate of a \$1 billion cut in cleanup funding. The priorities must be reversed.

Sincerely,

  
Beatrice Brailsford  
Program director

**Comment No. 2**

**Issue Code: 14**

DOE recognizes that it has facilities which require some level of environmental cleanup. Most of the facilities at Y-12 were designed and constructed in the 1940s and 1950s, prior to today's environmental requirements when the understanding of waste management principles was not what it is today. Over the past several years, DOE has had a very aggressive facility upgrade and clean-up program and has worked with EPA, the states, stakeholders, and the general public to clean up its facilities to acceptable levels. To date, DOE has completed numerous clean-up activities and is aggressively working toward the cleanup of its remaining environmental problems. Actions taken to continue Y-12 weapons support missions, and construction and operation of new facilities for the HEU Materials and Special Materials missions at Y-12 would not be inconsistent with nor impact these ongoing clean-up activities. Discussion of alternative uses of the Nation's funds is beyond the scope of the Y-12 SWEIS.